

Proceeding: IMPLEMENTATION OF A SECTION OF THE TELECOMMUNICATIONS ACT ☐ Record 1 of 1
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Dear Commissioners,

December 27, 1997

On January 31, 1995, the North American Numbering Plan Administration (NANPA) informed the FCC and Industry Canada that it was unable to resolve multiple applications from July 8, 1994 for telephone numbers in the 555 NXX (exchange), and referred the multiple applicant issue to FCC for resolution, pursuant to the 555 Assignment Guidelines (INC 94-0429-002, at Bellcore Letter IL-94/05-004 (5/13/94)).

On May 26, 1997 we again requested the FCC and Industry Canada to resolve these multiple applications for over 100 numbers in the 555 telephone numbering NXX. On October 21, 1997 we also requested NANC to conduct initial resolution of this numbering dispute, which has now been unresolved for 3 years. The NANC deferred to the FCC since it and Industry Canada already have had the matter under consideration and the current Assignment Guidelines for the 555 NXX call for resolution by the "appropriate regulatory authorities."

To date, there has been no action by FCC or Industry Canada on these 100+ multiple applicant 555 line numbers (out of 9,890 total available 555 numbers, about 2,300 have been assigned as of May, 1997, to about 550 entities).

The telecommunications industry has now completed its 555 assignment guidelines and 555 technical service interconnection arrangements for 555 access and exchange services.

In parallel, assignees of 555 numbers have been holding business plans in abeyance because incumbent local exchange carriers (ILECs) have not filled the 555 access and exchange orders placed by various 555 assignee serviced interexchange carriers, possibly because the ILECs are delaying 555 implementation until they themselves are in the interexchange business. There is now competitive LEC (CLEC) planning for 555 activation through the AIN (Advanced Intelligent Network) and now through Local Number Portability (LNP) or like solutions.

The most sought after 555 number assignments have been held-up now for over three years (those with multiple competing applicants, the subject of this letter, since 1994). Further delay in resolving assignment will deny carriers major traffic opportunities, including that for competitive LECs (CLECs) as the 555 assignee's terminating carrier. Also, any further delay in resolving multiple applicants would deprive current 555 number assignees of the market power of those still unresolved highly demanded 555 number assignments, likely representing major potential carrier orders for 555 service solutions. Further delay of activation arrangements by RBOCs in particular, even though contrary to the Commission's Non-Accounting Safeguards Order (12/23/96), would subject current 555 assignees to potential involuntary reclamation.

Our company is one of many applicants for 555-2355, and our clients have similar competing applications for other numbers.

The solution could be as simple as "picking a name from a hat". It is clear that the assignment of the 100+ multiple-applicant 555 numbers needs resolution now. Their assignment is crucial to interconnection implementation and the efficient use of the 555 Exchange. It is anticipated that the 555 exchange will also be used to provide needed services to the elderly, Alzheimer's sufferers, children, and others with difficulty in recall of 7 and now 10 digit telephone numbers, as presented to NANC in March and April, 1997.

Summary of Action Requested

The FCC is requested to set a date certain at which it, NANC, or NANPA will pick an assignee from the pools of remaining legitimate applicant- entities for each line number. We recommend that that date be not later than July 8, 1998, the four year anniversary of the initial release of the 555 resource and date on which the multiple applications were filed. This will allow time for the NANPA to determine which applicants were in fact legitimate entities upon application on July 8, 1994, and then to give formal notification of such an action to each applicant. The NANPA would then certify the list to be chosen from at random from applicants remaining. If a resolution is made by mutual consent of legitimate applicants¹ before the drawing, then that line number would be assigned in accordance with the NANPA accepted resolution.

Sincerely

Richard C. Bartel
President

¹ Applicants could merge with or acquire each other, or they could form a mutually owned entity to which all applicants would agree to have the line number assigned, which has occurred in other cases.